

Envision Technology Advisors, LLC
999 Main Street, Suite 715
Pawtucket, RI 02860
SPIN: 143042980

July 23, 2019

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re.: Request for Waiver on Docket No. 02-6 for E-Rate

Greetings!

This letter is to file a request for a waiver regarding payment of a Form 474 invoice we submitted on May 22, 2018 for Category 1 E-Rate services provided for Funding Year 2017 to our client Sturgis Charter School in Hyannis, Massachusetts. We have come to understand that there was confusion in how the Form 474 was submitted, relative to the service start date and when the “invoice date” was specified.

The Category 1 services in question were for internet bandwidth that was to increase in service level halfway through the Funding Year at their 105 W. Main Street location. That is, from July 1, 2017 through December 31, 2017, internet service was for 300Mbps, increasing to 500Mbps from January 1, 2018 through June 30, 2018. The FCDL received in Wave 22 correctly identifies the Service Start Dates for each of the two corresponding periods respectively. However, we have yet to receive payment for the portion related to the second six months of Funding Year 2017.

Our Accounting department made several inquiries regarding the outstanding amount of \$8,794.56 for FRN 1799113237. On July 12, 2019, USC Case # 278739 was opened, and we received the following response:

“The FRN was denied due to the customer bill date on the invoice being 07/01/2019. The SSD is 1/1/2018. You will need to submit a waiver to the FCC so you can invoice for the FRN since the invoicing deadline has passed.”

The date of the invoice we submitted was NOT 07/01/2019, but rather 7/1/2017, as submitted to the BEN, and the date of submission of the Form 474 was May 22, 2018, well within the deadline for this period’s services. So we are forced to ask whether the date in the Case Notes are a typo, and to surmise that perhaps the intention of the USAC agent was to say that payment wasn’t released was because the invoice date was 07/01/2017 on the basis of that being a problem related to the second period of services beginning January 1, 2018?

However, when reviewing the Form 474 we submitted, that statement does not seem to be accurate. On the Form 474 there are two lines submitted for Form 471 #171042340, each corresponding to the FRN’s for each 6-month period of service in FY2017. Field 9 shows Customer Billed Date as 7/1/2017, the start of FY2017, which is technically the date that we have in our system for issuing the invoice for



services for the FY2017 term. There is no field on Form 474 for Services Start Date (SSD). However, as previously stated, the Service Start Date for the FRN in question was correctly specified in the FCDL received, as well as corroborated on the Form 486 as well. We issued the summary invoice to the client at the beginning of the Funding Year showing all services for the year, the BEN's portion, SLD's discount portion, and the details pertaining to each of the services and the dates for each level of service. It is this initial summary invoice to which we were referring when we entered the 7/1/2019 date on Form 474.

At this point, services have long since been provided, with the service level increasing from 300Mbps to 500Mbps on January 1, 2018 as described. As the provider, we have long since paid the telco delivering the bandwidth services for the entirety of the 2017 Funding Year. We never received any notification (formal or otherwise) of a reason for non-payment until this calendar month, as explained above with the reference to the USAC case. We hope that the FCC can reasonably see that we are entitled to payment as previously agreed and committed to on the FCDL, as we had submitted all the information on Form 474 in good faith and within established deadlines. We understand that reimbursement deadlines have now passed for Funding Year 2017, but in light of these circumstances, we respectfully ask that we be granted a waiver such that payment for invoice ID 2814657 may be released.

Thank you for your consideration!

Respectfully,

Brent K. Ouellette
Vice President Vendor Operations

Enc.:
Form 471
FCDL Output from FY2017.22
Form 486
Envision Summary Invoice #67183 to Sturgis Charter
Form 474 ID 2814657 identifier Sturgis-C1-23459-A